

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

MATTHEW BECKER, a Washington resident;
LAUREN KUEHNE, a Washington resident;
ADAM CRISWELL, a Washington resident;
KRYSTAL CRISWELL, a Washington
resident; ALFEE DIXON, a Washington
resident; TYSON FARLEY, a Washington
resident; DONALD FINISTER SR., a
Washington resident; CHRISTOPHER HART,
a Washington resident; JASON KOVACK, a
Washington resident; RICKY LORENSIUS, a
Washington resident; HEATHER MAREK, a
Washington resident; MICHAEL MARTIN, a
Washington resident; DAISEY MARTINEAR,
a Washington resident; GRACE MATEIAK, a
Washington resident; IAN MATEIAK, a
Washington resident; JOHN MELOPRIETO, a
Washington resident; TRAVIS NEUMAN, a
Washington resident; ARIEL NEUMAN, a
Washington resident; MICHELLE PAULINO,
a Washington resident; JOHN PAULINO, a
Washington resident; JAMES RAMPONI, a
Washington resident; LINDSEY RAMPONI, a
Washington resident; ERIC MCCANDLESS, a
Washington resident; PAIGE ROE, a
Washington resident; PAUL ROHRER, a
Washington resident; ANDREW SICAT, a
Washington resident; NICOYA MCKINSEY, a
Washington resident; JEREMY SIERRA, a
Washington resident; ERICA SIERRA, a
Washington resident; DARIUS USMAN, a
Washington resident; KRISTEN ZABAGLO, a
Washington resident; DAVID WILSON, a
Washington resident; IAN LAUGHLIN, a
Washington resident; SHELLY LAUGHLIN, a
Washington resident; TAMMARA BOYLES, a
Washington resident; and BOBBY BOYLES, a
Washington resident; LAIN SUPE, a

Cause No. 3:21-cv-05185-BHS

PLAINTIFFS' DISCLOSURE OF
EXPERT WITNESSES

Washington resident; TIM WRIGLEY, a Washington resident; BILLY LUNSFORD, a Washington resident; ROBIN LUNSFORD, a Washington resident; CAMERON FLEWELLEN, a Washington resident; CHELSEA FLEWELLEN, a Washington resident; MOHAMMAD SIDDIQUE, a Washington resident; AMY HO, a Washington resident; MATTHEW GROFF, a Washington resident;

Plaintiffs,
vs.

TIG INSURANCE COMPANY, as successor by merger to AMERICAN SAFETY INDEMNITY COMPANY, a foreign insurer; ARCH EXCESS & SURPLUS INSURANCE COMPANY, a foreign insurer; UNITED SPECIALTY INSURANCE COMPANY, a foreign insurer; TRAVELERS INDEMNITY COMPANY, a foreign insurer; ARCH INSURANCE GROUP, a foreign insurer; ATLANTIC CASUALTY INSURANCE COMPANY, a foreign insurer; NEVADA CAPITAL INSURANCE COMPANY, a foreign insurer; NAUTILUS INSURANCE COMPANY, a foreign insurer; WESTERN WORLD INSURANCE, a foreign insurer; OHIO CASUALTY INSURANCE COMPANY, a foreign insurer; PREFERRED CONTRACTORS INSURANCE CO. RRG LLC, a foreign insurer;

Defendants.

Please take notice that Plaintiffs Matthew Becker, et al, by and through their attorney Todd Skoglund of Skoglund Law LLC, reserve the right to call the following expert witness at trial. Discovery is ongoing in this case, so this disclosure is based on the information known to date. Plaintiffs reserve the right to add additional expert witnesses as discovery continues.

EXPERT WITNESSES

1. J. Kay Thorne
Thorne Risk Management Consulting Inc.
4243 SW 323rd Street
Federal Way, WA 98023-2495

Mr. Thorne is an expert in claim handling, claim management and litigation management on large complex insurance claims. He is expected to testify regarding claim practices, investigations, and WAC 284.30.300-400, RCW 19, and other matters and actions of insurers. He will review the claim file produced and testify to its contents or lack thereof.

RESERVATION OF RIGHTS

1. Plaintiff reserves the right to name additional expert witnesses as necessary to rebut and address testimony by defendants' experts as discovery continues.

2. Plaintiff does not waive any privilege with respect to any consulting experts listed herein.

3. Plaintiff reserves the right to add or substitute other experts for any of the experts disclosed due to scheduling or availability concerns or new issues raised by any party during the course of discovery.

DATED this 16th day of September, 2022.

SKOGLUND LAW LLC

By: /s/ Todd K. Skoglund
Todd K. Skoglund, WSBA #30403
704 228th Ave. NE #186
Sammamish, WA 98074
Telephone: (425) 406-6777
Email: todd@skoglundlaw.com
Attorney for Plaintiffs

J Kay Thorne, CPCU
Thorne Risk Management Consulting, Inc.
4243 SW 323rd Street
Federal Way, WA 98023-2495

Experience:

I have been a licensed Agent and Broker in Washington, Oregon, Alaska & California and have over 50 years of experience in claim handling, claim management and litigation management on a variety of large complex insurance claims. I have been a licensed Life Insurance Agent in California and Utah. This involved working closely with insurance companies (claims & underwriting), risk managers, attorneys and policyholders in order to facilitate a resolution in cases involving coverage and/or damage issues.

Have extensive experience on coverage issues and have served as a consultant and expert witness with respect to:

- | | |
|---------------------|--------------------------|
| • Coverage | • Investigations |
| • Custom & Practice | • Reporting |
| • Documentation | • Reserves |
| • Duty to Defend | • Settlement |
| • Fraud | • Subrogation & Recovery |

Have served as a consultant on many large and complex losses involving:

- | | |
|--|---|
| • Premises Liability | • Environmental Coverage & Liability |
| • Contractual Liability | • Malpractice Liability |
| • Automobile Liability | • Professional Errors & Omissions Liability |
| • Products – Completed Operations Liability | • Umbrella/Excess Liability |
| • Construction Defect | • Agent/Broker Duties |
| • Property (Business Interruption, Boiler & Machinery) | • Directors & Officers |
| • Builder's Risk | • Life & Disability |
| • Marine & Inland Marine | • Workers Compensation |

Employment:

- J. Kay Thorne, CPCU, Thorne Risk Mgmt Consulting, Inc., 1987 to Present
- Aon Risk Services, Inc., Senior Vice President, Claims, 1998 to 1999
- Parker, Smith & Feek, Inc., Vice President, Claims, 1985 to 1998
- Wausau Insurance Companies, Claim Supervisor, 1976 to 1985
- Transwestern Adjusting Co., Adjuster, 1974 to 1976
- Liberty Mutual Insurance Co., Adjuster, 1970 to 1972

Education:

- The American Institute for Property & Liability Underwriters, Inc., CPCU (Chartered Property Casualty Underwriter), 1987
- American Education Institute, CPCLA (Casualty Property Claim Law Associate), 1981
- University of Utah, B.S., Political Science, 1970

TRIAL, ARBITRATION (Partial list)

John Bennett v. David Newman, et al., (Seattle, 2017)
 Eagle West Insurance Co. v. SAT 2400, LLC, et al. (Seattle, 2016)
 Austin Mutual Ins. Co. v. Advantage Ins. Serv. (Seattle, 2013)
 Jane Reardon v. Farmers Ins. Co. (Seattle, 2009)
 Viskovich v. Sprague Israel Giles, et al. (Seattle, 2008)
 Compass Const. Co. v. Malcolm Drilling Co. (Seattle, 2007)
 FCCC v. King County (Seattle, 2004)
 J. Danner Corp. v. Woodbridge Development (CA, 2002)
 Cornerstone v. Western Pac. Mutual Ins. (Seattle, 2000)
 Mercer Place Condos v. St. Farm Ins. (Seattle, 1999)
 State of Oregon v. Snyder Roofing (OR, 1999)
 Strand Hunt Const. v. Wausau Ins. Co. (Seattle, 1996)
 Continental Ins. v. Lloyd's of London (OR, 1995)
 Taylor v. Zurich American Insurance (Seattle, 1994)
 Nielson v. Farmers Insurance (Montana, 1991)
 SDL v. CIGNA (Seattle, 1990)

DEPOSITION, AFFIDAVIT (Partial list)

Westboro Condo Assoc. v. Country Casualty Ins. Co., et al. (Seattle 2022)
 Markel American Ins. Co. v. Clearview Horizon, Inc. (Montana, 2022)
 Corliss Condo Owners Assoc. v. National Surety Corp. and The American Ins Co. (Seattle, 2022)
 Outlook West I Condo Assoc. v. Farmers Ins. Co. (Seattle, 2022)
 Richmond Sequoia HOA v. State Farm, et al (Seattle, 2022)
 Gold Creek Condominium Assoc. v. State Farm, et all (Seattle, 2022)
 Edmonds Greenery v. St. Farm Ins. et al (Seattle, 2022)
 Franssen Condo Assoc. v. Country Mutual Ins., et al (Seattle, 2021)
 Corliss COA v. National Surtey Corp. and The American Ins Co. (Seattle, 2021)
 William Germann v. Safeco Ins. Co. of America (Seattle, 2021)
 James W. Fowler, Inc. v. Cell-Crete Corp et al. (Seattle, 2021)
 Avalon HOA, et al. v. Century Surety Co. et al. (Seattle, 2021)
 The Cincinnati Ins. Co. v. Northwest Painting, Inc. (Montana, 2021)
 PCIC v. Baker and Son Construction, et al. (Tacoma, 2021)
 PRO.com's mediation demand relating to Chagnon project against Keck General Construction Pro.com Chagnon Project (Seattle, 2021)

Newport Villa COA v. Allstate Inc. Co. (Seattle, 2021)
 Tulalip Tribes, et al. v. Lexington Ins. Co. et al. (Snohomish County, 2021)
 Gold Creek Condominium Assoc. v. State Farm (Seattle, 2021)
 Queen Anne North HOA, v. Century Ins. Co., et al. (Seattle, 2021)
 1515 East Union v. Allstate Ins. Co. (Seattle, 2021)
 Village on James Street Condo. Assoc. v. Eagle West Ins. Co. (Seattle, 2020)
 The Highlands North HO Assoc. v. Allstate Ins. Co. (Seattle, 2020)
 Mark & Julia Fennell v. S&M Transactions, Inc., et al. (Clark County, 2020)
 Queen Anne North HOA, v. Allstate Ins. Co., et al. (Seattle, 2020)
 Villa Appia, LLC v. Truck Ins. Exchange (Seattle, 2020)
 Julia Cummings v. Safeco Ins. Co. of America, et al. (Seattle, 2020)
 Travelers Property Co. of America & Casualty v. North American Terrazzo, Inc., (Seattle, 2002)
 James H. & Leona Orr v. Farmers Ins. Co., et al. (Seattle, 2020)
 1515 East v. United National and Penn-Starr, (Seattle, 2020)
 Longfellow Run Association v. State Farm Ins. Co. (Seattle, 2020)
 Osborne Const. Co. v. International Insurance Co. of Hannover, et. al. (Seattle, 2020)
 Joshua Earhart, et al. v. Roof Doctors, Inc., et al. (Olympia, 2019)
 Osborne Const. Co. v. Certain Underwriters at Lloyd's (Seattle, 2019)
 Ocean Gold Seafoods, Inc. v. Hartford Steam Boiler (Tacoma, 2019)
 Robert & Kerry Ellen Hart v. Mountain West Farm Bureau Mutual Ins. Co. (Montana, 2019)
 Kirkwood Condominium Assoc. v. State Farm Ins. (Seattle, 2019)
 Canyon Estates Condo. v. Atain Specialty Ins., et al (Seattle, 2019)
 Osborne Const. Co. v. Zurich American Ins. Co. (Seattle, 2019)
 Douglas M. Pratt, et al. v. Castle Ins. Associates, et al. (Seattle, 2019)
 Ryan Stier v. Pemco Mutual Ins. Co. (Tacoma, 2019)
 Steven Nei v. Traveler Home & Marine Ins. Co. (Montana, 2018)
 Michael Steinore v. Mutual of Enumclaw Ins. Co. (Seattle, 2018)
 Carlisle Creek v. American Automobile Ins. Co., et al. (Seattle, 2018) weekly maintenance spanking